

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 08 CR 327
)	
v.)	Judge Ruben Castillo
)	
KAMLESHWAR GUPTA)	Magistrate Judge Denlow
and KAM ENGINEERING, INC.,)	
)	
Defendants.)	

AGREED MOTION FOR EXTENSION OF SCHEDULE

Defendant KAMLESHWAR GUPTA, by and through the undersigned attorneys, hereby moves for an order extending the schedule for pretrial motions. In support of this motion, Defendant states as follows:

1. On April 30, 2008, the Court entered a scheduling order that provided for any pretrial motions to be filed by July 18, 2008, and set a status hearing for July 23, 2008, at 9:30 a.m.
2. Defendant KAMLESHWAR GUPTA recently retained Perkins Coie LLP to represent him in this matter. Pravin B. Rao and Jonathan R. Buck have separately filed a motion for leave to appear on behalf of Defendant KAMLESHWAR GUPTA on July 7, 2008.
3. On July 3, 2008, the Court granted the motion of George Pappas to withdraw as attorney for Defendant KAMLESHWAR GUPTA. Mr. Pappas will continue to represent Defendant KAM ENGINEERING, INC.
4. In order to allow substitute counsel for Defendant GUPTA an opportunity to review relevant documents and background in this matter, and to allow time for the government and Defendants to determine whether this matter can be resolved short of trial, Defendant

GUPTA respectfully requests that the time for filing of pretrial motions be extended and that a new schedule be set by the parties and the Court at the status hearing on July 23, 2008 at 9:30 a.m.

5. On July 7, 2008, I contacted Assistant U.S. Attorney Christina Egan, who agreed to the request for an extension of the schedule for pretrial motions.

6. The motion is brought in order to facilitate the orderly and efficient resolution of this matter, and not for purposes of delay.

7. Pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B), Defendant GUPTA agrees to the exclusion of time in the interests of justice for any extension of the schedule for pretrial motions.

WHEREFORE, Defendant GUPTA requests that the Court extends the time for filing of pretrial motions and set such schedule on July 23, 2008.

Date: July 7, 2008

Respectfully submitted,

KAMLESHWAR GUPTA, Defendant,

By: /s/ Pravin B. Rao
Attorney For Defendant,
Kamleshwar Gupta

Pravin B. Rao (ARDC #06230097)
Jonathan R. Buck (ARDC #06281672)
PERKINS COIE LLP
131 South Dearborn Street
Suite No. 1700
Chicago, Illinois 60603-5559
Tel: (312) 324-8400
Fax: (312) 324-9400

CERTIFICATE OF SERVICE

I, Pravin B. Rao, certify that on July 7, 2008, I caused a true and complete copy of the
AGREED MOTION FOR EXTENSION OF SCHEDULE on behalf of Defendant,
Kamleshwar Gupta, to be served via CM/ECF upon:

Christina Egan
Assistant United States Attorney
219 South Dearborn Street, 5th Floor
Chicago, Illinois 60604

George Pappas
Attorney at Law
Three First National Plaza
Suite No. 3700
Chicago, Illinois 60602

/s/Pravin B. Rao